



November 27, 2002

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Mr. Jim Harris, P.E.
US EPA Montana Operations
10 West 15th Street, Suite 3200
Helena, MT 59626

RE: Response to Comments and Submittal of the Revised TI Document

Dear Mr. Harris:

On behalf of The Burlington Northern and Santa Fe Railway Company (BNSF), The RETEC Group, Inc. is pleased to submit the revised *Technical Impracticability Evaluation for Groundwater Restoration*, for the former BNSF Tie Treating Plant in Somers, Montana. As per your October 21, 2002 letter we have incorporated all of the changes from the August 31, 2001 response to comments in this final document. Comments received in your October 2002 letter have also been incorporated and a response to comments is attached to this letter.

Thank you for your assistance, we look forward to finalizing the TI evaluation and proceeding with an ESD for the BNSF Somers, Montana site. If you have any questions or comments please feel free to contact me at 303-271-2129 or Lani Carlson at 652-7481.

Sincerely,
The RETEC Group, Inc.

Chris Cosentini
Sr. Environmental Engineer

Cc: D. Smith/BNSF
L. Dewitt/MDEQ
M. Bell/Weston
L. Carlson/RETEC
C. Trueblood/PG&E



491092

Technical Impracticability Evaluation for Groundwater Restoration

BNSF Somers, Montana

August 31, 2001

Response to Comments Received from EPA October 21, 2002

Comments:

1. The discussions contained in the executive summary and the body of the report must completely and concisely describe the waiver process, and specify the ARARs for which a waiver is requested. This discussion should also explicitly state that the remediation levels as adopted in ESDs are risk-based levels, and as such are not eligible for waiver through the TI process.

Response:

Comment incorporated.

2. The area proposed for TI waiver must be depicted on a figure, included in the TI evaluation document, and must be one contiguous area rather than two separate units, consistent with the Controlled Groundwater Use Area. The rationale for selection of the boundaries, both horizontal and vertical, must be presented in the report. Please demonstrate that the monitoring locations used to determine the boundary of the area are appropriate (specifically well S-6).

Response:

A figure has been included in Section 5.2 illustrating the area proposed for the TI waiver.

3. In the Executive Summary, include zinc as a contaminant of concern.

Response:

Comment incorporated.

4. Table 1-1. Add to Table 1-1 the revised risk-based remediation levels that were adopted through the 1992 and 1998 ESDs.

Response:

The TI is requesting to waive the ARARs presented in Table 1-1. BNSF is not requesting a waiver of risk-based remediation levels, therefore they are not included in Table 1-1. Risk-based remediation levels and ARARs are presented in Table 5-1. The 1992 ESD did not revise either risk-based remediation levels or ARAR based requirements. Revisions resulting from the 1998 ESD are shown in Table 5-1.

5. Page 3-8. Paragraph 2. Page 4-3. Paragraph 2. The system has operated for 6 years at this point, rather than 5 years.

Response:

Comment incorporated.

6. Page 4-4. Section 4.3. Some of the alternatives in Section 4.3 provide numbers for a 100 year time frame, and some provide numbers for a 50 year time frame. The alternatives discussed in Section 4.3 must be consistent in their use of reasonable time frame for remediation. EPA's TI Guidance states that "Very long restoration time frames (e.g., longer than 100 years) may be indicative of hydrogeologic or contaminant-related constraints to remediation." Although previous estimates of the required time for groundwater remediation reflected a 50 year period (1992 ESD), please use 100 years for evaluating the reasonableness of each of the remedial alternatives.

Response:

Comment incorporated.

7. Page 5-1. Section 5.1. Paragraph 1. "The groundwater ARARs in the ROD ..." This should perhaps be remediation levels.

Response:

Comment incorporated.

8. Page 5-4. Paragraph 2. "The ARARs to be waived within the TI waiver areas are shown in Table 1-1." Table 1-1 lists the remediation levels developed for the site, and the underlying ARARs are included only as a footnote to the table. Please list and cite the ARARs to be waived.

Response:

The reference to Table 1-1 in Section 5-1 has been changed to Table 5-1. Table 5-1 lists specific ARARs and risk based remediation levels.

9. Page 6-1. Bullet 2. Contaminant Characteristics. "DNAPL does not exist...". Change to "DNAPL has not been encountered."

Response:

Comment incorporated.

10. Page 6-2. Section 6.1. Bullet 1. ARARs can be waived, but risk-based remediation levels cannot be waived. Please modify the text appropriately.

Response:

Comment incorporated.

Editorial Comments:

Page 3-11. Section 3.2.1. Wells MW-93-2S and MW-93-2D. Paragraph 2, line 1. Insert a space between "5" and "percent".

Response:

Comment incorporated.

Page 4-4. Paragraph 1. Insert "is" between "and" and "summarized."

Response:

Comment incorporated.

Page 4-5. Alternative 3. Paragraph 1. "Exch" must be corrected to read "Each".

Response:

Comment incorporated.

Page 4-6. Paragraph 1. "Department of Natural Resources (DNR)" should be changed to read "Department of Natural Resources and Conservation (DNRC)."

Response:

Comment incorporated on page 4-16, Section 4.3.6.1.

Page 4-19. Section 4.3.6.3. Paragraph 1. "DNR" should be changed to "DNRC."

Response:

Comment incorporated.

Page 4-19. Section 4.3.6.4. Paragraph 1. Insert "groundwater" between "controlled" and "use".

Response:

Comment incorporated.

Page 5-1. Section 5.1. Paragraph 3. "...the site groundwater it is classified..." Delete "it" so the sentence reads "...the site groundwater is classified..."

Response:

Comment incorporated.

Page 5-2. Paragraph 1. Revise "...from the Somers municipal system, it is not reasonable to expect that the surficial aquifer downgradient of the Somers site..." to read "...from the Somers municipal system, it is unlikely that the surficial aquifer downgradient of the Somers site..."

Response:

Comment incorporated.

Page 6-2. Section 6.1. Bullet 2. Sentence 2. Change "prevent" to "prohibit."

Response:

Comment incorporated.

Page B-7. Table B-1. What does the NOTE below Table B-1 have to do with the Table? I believe that it could be deleted.

Response:

Comment incorporated.

Appendix D. Insert the correct Table and Figure numbers in the text. (Paragraph 2 - Which table does "XX" refer to? Well S-6 - Table D-1 and Figure D-1; Wells S-88-2 and S-88-3 - Table D-2 and Figure D-2; Wells S-93-2S and S-93-2D - Table D-3 and Figure D-3.)

Response:

Comment incorporated.